

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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METROPOLITAN LIFE INSURANCE	:	
COMPANY,	:	
	:	DECLARATION OF SEAN T.
Plaintiff,	:	O'LEARY IN SUPPORT OF
	:	MOTION TO DISMISS OR
	:	STAY ACTION
-against-	:	
	:	07 CV 7310 (GBD)
KATHRYN CLAIRE CAMPBELL,	:	
CATHERINE LEE WERNER and	:	ECF CASE
SHARON CAMPBELL,	:	
	:	
Defendants.	:	
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SEAN T. O'LEARY, being duly sworn, deposes and says:

1. I am an attorney associated with the law firm of Wormser, Kiely, Galef & Jacobs LLP, attorneys for the Defendants, Kathryn Claire Campbell and Sharon Campbell (the "Defendants"). I am admitted to practice in the United States District Court for the Southern District of New York, and make this Declaration in support of the Defendants' Motion to dismiss the Complaint of the Plaintiff, Metropolitan Life Insurance Company (the "Plaintiff"), or to stay this action pending resolution of the concurrent and parallel action pending in Nevada.
2. I respectfully direct this Court's attention to the Defendants' Memorandum of Law in support of their Motion to dismiss the Complaint or to stay this action, which Memorandum of Law details the legal bases in support of the Motion.
3. For this Court's reference, attached hereto as Exhibit A is a true copy of a Complaint of Kathryn Claire Campbell, dated July 20, 2007, and filed in the Second Judicial District Court of the State of Nevada, County of Washoe, on July 20, 2007.

4. Attached hereto as Exhibit B is a true copy of an Answer of Metropolitan Life Insurance Company, dated August 31, 2007, in the Second Judicial District Court of the State of Nevada, County of Washoe.

5. Attached hereto as Exhibit C is a true copy of an Answer of Catherine Werner, dated August 9, 2007, in the Second Judicial District Court of the State of Nevada, County of Washoe.

6. Attached hereto as Exhibit D is a true copy of the Interpleader Complaint of Metropolitan Life Insurance Company, dated August 15, 2007, and filed with this Court on August 15, 2007.

WHEREFORE, for the reasons stated in its Memorandum of Law, the Defendants request that this Court dismiss the Complaint of the Plaintiff, Metropolitan Life Insurance Company, or stay this action pending resolution of the concurrent and parallel action pending in Nevada, and/or direct such other and further relief as this Court deems just and proper.

Dated: New York, New York
September 7, 2007

/S/
Sean T. O'Leary (SO-4542)